

1 **EXHIBIT 13**

2 **UNITED STATES DISTRICT COURT**
3
DISTRICT OF NEVADA

4
DREW J. RIBAR, Pro Se Plaintiff
5 3480 Pershing Ln
6 Washoe Valley, NV 89704
(775) 223-7899
7 Const2Audit@gmail.com

8 vs.
9

10
WASHOE COUNTY, et al.
11

12 Defendants.
13

14 Case No.: 3:24-ev-00526-ART-CLB
15

16
EXHIBIT 13

17
Title: Internal Emails Between Washoe County Library System (WCLS) Leadership Regarding
18 Public Messaging and Friends of the Library's Role in Supporting Drag Queen Story Hour
19
(DQSH)

20
Date: May 10, 2023

21
Source: Internal email correspondence among Washoe County Library System officials

22
Bates Number Range: EXH070-EXH071

23
24
25
26
27
28 PLEADING TITLE - I

Filed	Received	Entered	Served On
Counsel/Parties of Record			
MAR 24 2025			
Clerk US District Court			
District of Nevada			
By:			Deputy

DESCRIPTION

This exhibit contains internal emails among Washoe County Library System (WCLS) leadership discussing public messaging strategies related to Drag Queen Story Hour (DQSH). The emails include communications between:

- **Jeff Scott** (Library Director, WCLS)
- **Jamie Hemingway** (Interim Public Information and Development Officer, WCLS)

Key discussion points in the emails include:

1. **Drafting a response** regarding the Friends of the Library's role in funding Drag Queen Story Hour events.
2. **Deliberating** whether to present the response as an official WCLS statement or from the perspective of Jeff Scott personally.
3. **Modifying event descriptions** to frame DQSH as "one of many programs" to avoid public criticism.
4. **Coordinating public messaging** between WCLS leadership to ensure a **unified response** and **mitigate potential backlash** regarding WCLS's role in hosting DQSH events.
5. **Refining language** in external communications to **downplay the level of financial support** Friends of the Library provided for DQSH.

1 **RELEVANCE TO CASE**

2
3 **Supports First and Fourteenth Amendment Claims**

4

5 • Demonstrates viewpoint-based discrimination and government control over
6 messaging, violating First Amendment principles (see **Packingham v. North**
7 **Carolina, 582 U.S. 98 (2017)**).
8

9 • Shows that WCLS officials deliberately tailored public statements to shape the
10 narrative, supporting content-based regulation of speech (see **Reed v. Town of Gilbert,**
11 **576 U.S. 155 (2015)**).

12
13 **Refutes BOC's Motion to Dismiss**

14

15 • Strengthens the argument that WCLS directly controlled public messaging about
16 **DQSH**, proving they were not a neutral entity but active participants in viewpoint
17 discrimination.
18

19 • Provides additional evidence of coordination between government officials and
20 private organizations to promote a specific agenda, undercutting BOC's claims of
21 independent operation.

22
23 **Relevant to Monell Liability**

24

25 • Establishes that Washoe County Library officials, including **Jeff Scott**, were actively
26 involved in shaping the public perception of DQSH events, making Washoe County
27 liable under **Monell v. Dep't of Soc. Servs., 436 U.S. 658 (1978)**.

- Demonstrates WCLS's deliberate policy of controlling speech and event messaging, violating government neutrality requirements under the First Amendment.

CERTIFICATE OF AUTHENTICITY

I, Drew J. Ribar, certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the attached documents are **true and accurate copies** of internal emails obtained from Washoe County Library System officials through public records requests and other legal means.

Dated: March 17, 2025

Signed:

/s/ Drew J. Ribar

Drew J. Ribar, Pro Se

3480 Pershing Ln

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com

10. The following table summarizes the results of the study. The first column lists the variables, the second column lists the descriptive statistics, and the third column lists the regression coefficients.

10. The following table summarizes the results of the study.

10. The following table shows the number of hours worked by 1000 workers in a certain industry.

10. The following table shows the number of hours worked by 1000 workers in a certain industry.

10. The following table summarizes the results of the study. The first column lists the variables, the second column lists the descriptive statistics, and the third column lists the results of the regression analysis.

From: Scott, Jeff <jscott@washoecounty.gov>
Sent: 10 May 2023 18:29
To: Hemingway, Jamie
Subject: Re: Friends Response draft
Attachments:

I think general is fine. It's technically coming from the Friends.

Thanks

Jeff

Jeff Scott
Library Director | Washoe County Library System
jscott@washoecounty.gov | Office: 775.327.8340
301 S. Center Street, Reno, NV 89501

From: Hemingway, Jamie <Hemingway@washoecounty.gov>
Sent: Wednesday, May 10, 2023 11:27:27 AM
To: Scott, Jeff <jscott@washoecounty.gov>
Subject: Re: Friends Response draft

Hi Jeff,

I made a few edits and added in all the current programs funded by the Friends. edited Drag Queen storytime Friends.docx

Also, do you want this to be more of a general WCLS statement, or to be first person from you?

Thanks,

Jamie

EXH070

—
Jamie Hemingway
Interim Public Information and Development Officer | Washoe County Library System
jhemingway@washoecounty.gov | Office: 775-327-8360
301 South Center Street, Reno, NV 89501
—

From: Scott, Jeff <jscott@washoecounty.gov>
Sent: Wednesday, April 26, 2023 10:38 AM
To: Hemingway, Jamie <JHemingway@washoecounty.gov>
Subject: Friends Response draft

Jamie,

Go ahead and take a look and make any edits you see fit. I was probably a little loose with what the Friends support so more detail would help demonstrate this is one of many programs.

Thanks,

Jeff

 Jeff Scott
Library Director | Washoe County Library System
jscott@washoecounty.gov | Office: 775.327.8340
301 S. Center Street, Reno, NV 89501
 [](#) [](#) [](#)

EXH071